

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

FG SRC LLC,

Plaintiff,

v.

INTEL CORPORATION,

Defendant.

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Case No. 6:20-CV-00315-ADA

Jury Trial Demanded

JOINT STIPULATION TO TRANSFER VENUE TO AUSTIN DIVISION

WHEREAS, the above-captioned action was filed by Plaintiff FG SRC LLC (“Plaintiff”) against Defendant Intel Corporation (“Defendant”) in the United States District Court for the Western District of Texas, Waco Division on April 24, 2020.

WHEREAS, in the above-captioned action, Plaintiff alleges that certain of Defendant’s products (the “Accused Products”) infringe U.S. Patent No. 7,149,867 (“the ’867 Patent”); Defendant denies those allegations.

WHEREAS, pursuant to 28 U.S.C. § 1404(b), Defendant alleges that transferring the above-captioned action to the United States District Court for the Western District of Texas, Austin Division, would serve the convenience of the parties and witnesses and the interest of justice; and Plaintiff consents to the filing of this joint stipulation so long as the transferred case remains on the docket of United States District Judge Alan D Albright.

NOW, THEREFORE, Plaintiff and Defendant, through their respective counsel, hereby jointly stipulate to the entry of an Order transferring the above-captioned action to the United States District Court for the Western District of Texas, Austin Division and that the transferred

case will remain on the docket of United States District Judge Alan D Albright. Plaintiff and Defendant request that an Order be entered directing the Clerk of Court to transfer the above captioned case to the Austin Division but to remain on the docket of this Court.¹

¹ Intel asserts that whether venue in either division (Waco or Austin) is appropriate depends on the facts of the case. Here, Intel is not seeking to transfer out of the District because facts, balance of convenience, and public and private factors in this particular case do not warrant transfer out of the District. However, given the extent of Intel's operations in other states, transfer out of this District may be appropriate in other cases involving different circumstances.

Dated: August 6, 2020

Respectfully submitted,

By: /s/ Ari Rafilson

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Counsel for Defendant Intel Corporation

CERTIFICATE OF CONFERENCE

I hereby certify that the parties met and conferred on August 6, 2020, and that Plaintiff and Defendant agreed to request the relief sought herein.

/s/ Brian C. Nash

Brian C. Nash

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on all counsel of record via the Court's ECF system on August 6, 2020.

/s/ *Brian C. Nash*

Brian C. Nash